

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Paul WILLIAMS

Case: 2:20-mj-30444

Assigned To : Unassigned

Assign. Date : 10/22/2020

CMP: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2, 2020, in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1) and (b)(1)(C)	Delivery and possession with intent to deliver controlled substances.

This criminal complaint is based on these facts:

See Attached Affidavit.

Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: October 22, 2020

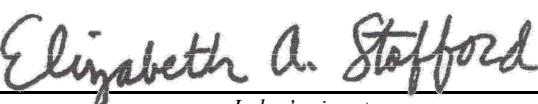
City and state: Detroit, MI



Complainant's signature

John P. Bolos, Jr., Task Force Agent, FBI

Printed name and title



Judge's signature

Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A
CRIMINAL COMPLAINT**

I, John P. Bolos Jr., being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I am a Border Patrol Agent, and have been employed as the same for the past 11 years. I am currently assigned to the Federal Bureau of Investigation (FBI) in the capacity of a Task Force Agent (TFA). I am assigned to investigate gang and drug offenses in the Detroit, Michigan, Metropolitan area with a concentration focused on Macomb County, Michigan. I am deputized as a part of the FBI's Macomb County Gang and Violent Crime Task Force. I have attended classes, seminars and debriefings on narcotic investigations in package interdiction, narcotic interdiction in street-level drug dealing, surveillance, drug identification, the use of field test kits for illegally possessed controlled substances. I have investigated, arrested, and/or assisted in the prosecution of numerous people as relates to their involvement with illegal drugs or drug related crimes.
2. This affidavit is based on my personal investigation. This affidavit does not include all the information known to law enforcement related to this investigation. This affidavit only includes probable cause that Paul WILLIAMS, possessed with intent to distribute controlled substances, in violation of 21 U.S.C. § 841.

II. SUMMARY OF INVESTIGATION

3. In 2019, the FBI began an investigation based on information from a FBI confidential human source (hereafter as CHS-1), that Michael Lawrence ROSE, of 95XX Mansfield Street, Detroit, Michigan, was involved in the distribution of cocaine in the Wayne County area. The identity of CHS-1 is known to me and other members of the MCGVCTF. CHS-1 has provided reliable, corroborated and accurate information related to the criminal activity in this case.
4. In November 2019, the MCGVCTF, through physical and electronic surveillance, confirmed that ROSE distributes cocaine out of his residence at 95XX Mansfield Street Detroit, Michigan. Affiant and other law enforcement officers, during surveillance operations, observed a high rate of vehicle traffic that was consistent with suspected drug transactions occurring at the Mansfield address. Frequent visits by numerous individuals began in the morning and continued throughout day and into the evening. During these visits, individuals would park in the street, leave their vehicle running, and enter the 95XX Mansfield address for one to five minutes before the same person would exit and leave. Occasionally, individuals would park in front and someone from the Mansfield address would come out, enter the passenger side of the waiting vehicle for a couple minutes before exiting and then return to the house. The vehicle would then leave the area. In my experience, these frequent, short-term

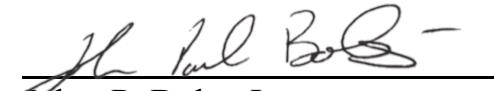
visits were consistent with drug transactions. Through physical and electronic surveillance, MCGVCTF also confirmed that ROSE distributed cocaine from vehicles, at prearranged meeting locations.

5. Additionally, the MCGVCTF, through physical and electronic surveillance, confirmed that ROSE was distributing cocaine to an individual whose phone number, 313-459-XXXX, was associated with 93XX Sorrento Street, Detroit, Michigan.
6. In January 2020, Members of the MCGVCTF conducted a trash recovery operation. During the operation, the following items were recovered:
 - a. Documents identifying Paul WILLIAMS as the occupant of 93XX Sorrento Street, Detroit, Michigan;
 - b. Documents identifying Paul WILLIAMS' phone number as 313-459- XXXX (full number known to Affiant); and
 - c. Plastic baggies with suspected cocaine residue which field tested positive for the controlled substance cocaine.
7. On March 2, 2020, members of the MCGVCTF executed a search warrant authorized by the Hon. R. Steven Whalen on February 26, 2020 at 93XX Sorrento Street, Detroit, Michigan. WILLIAMS was located in the house.
8. During the search of the residence, members of the MCGVCTF located and seized the following items, among others:

- a. Approximately 15.5 grams of suspected crack cocaine found on WILLIAMS' dresser;
 - b. A plate with suspected cocaine residue and a razorblade found on WILLIAMS' dresser;
 - c. Plastic baggies with suspected cocaine residue found in the garbage; and
 - d. Measuring cup with suspected cocaine residue found on WILLIAMS' dresser
9. I am aware, based on my training and experience as well as having been involved in the earlier investigative efforts in this case that the amount of cocaine, packaging materials and other evidence seized on March 2, 2020 is indicative of drug distribution.

III. CONCLUSION

Based upon the foregoing, I submit that probable cause exists to believe that Paul WILLIAMS did deliver and did possess with intent to deliver controlled substances, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).



John. P. Bolos Jr.
Task Force Agent, FBI

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Elizabeth A. Stafford

Elizabeth A. Stafford
UNITED STATES MAGISTRATE JUDGE

Dated: October 22, 2020